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LAUREN M. HOYE
WILLIG, WILLIAMS & DAVIDSON
PA Attorney ID No.: 307411
1845 Walnut Street, 24th Floor
Philadelphia, PA 19103
Telephone: (215) 656-3600
Facsimile: (215) 546-0942
E-mail: lhoye@wwdlaw.com

Attorney for Defendant SEIU Local 668

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Catherine Kioussis,)	
)	
)	
Plaintiff,)	CASE NO. 1:19-cv-01367-JEJ
)	
v.)	
)	NOTICE OF RELATED CASE
Service Employees International Union)	
Local 668,)	
)	
Defendant.)	
)	

Defendant Service Employees International Union Local 668 (“SEIU Local 668”) gives notice of a related case within this District.

On August 7, 2019, Plaintiff Catherine Kioussis filed this putative class action complaint against Service Employees International Union Local 668 (“SEIU Local 668”), Case No. 19-cv-01367-JEJ. Plaintiff Kioussis is represented by SEIU

Local 668 for collective bargaining purposes. Plaintiff Kioussis seeks certification of a class of all employees who paid fair-share fees to SEIU Local 668. *See Kioussis*, Dkt. #1 at ¶1. Kioussis seeks a class-wide refund of those fair-share fees under 42 U.S.C. §1983.

Previously, on October 18, 2018, Plaintiff Bethany LaSpina filed a putative class action complaint against SEIU Local 668, among other unions. *See LaSpina v. SEIU Local 668 et al.*, 3:18-cv-02018-MEM (M.D. Pa.). Plaintiff LaSpina is represented by SEIU Local 668 for collective bargaining purposes. Plaintiff LaSpina seeks certification of a plaintiff class that includes all public employees in Pennsylvania who paid fair-share fees to SEIU Local 668. *See LaSpina*, Dkt. #41 at ¶45. LaSpina seeks a class-wide refund of those fair-share fees under 42 U.S.C. §1983.

Thus, the asserted §1983 claims in *Kioussis* are the same as claims asserted against SEIU Local 668 in *LaSpina*, and the proposed class in *Kioussis* is subsumed by the proposed class in *LaSpina*.

Date: August 21, 2019

Respectfully Submitted,

/s/Lauren M. Hoyer
LAUREN M. HOYE, ESQUIRE
WILLIG, WILLIAMS & DAVIDSON
1845 Walnut Street, 24th Floor
Philadelphia, PA 19103
Telephone: (215) 656-3600
Facsimile: (215) 546-0942
E-mail: lhoye@wwdlaw.com

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CERTIFICATE OF SERVICE

I, LAUREN M. HOYE, hereby certify that I have this day caused a true and correct copy of the foregoing NOTICE OF RELATED CASE to be served via the Court's CM/ECF upon the following:

Counsel for Plaintiff

Charles O. Beckley, II, Esquire
Beckley & Madden, LLC
212 North Third Street - Suite 301
Harrisburg, Pennsylvania 17101

Date: August 21, 2019

/s/Lauren M. Hoyer
LAUREN M. HOYE, ESQUIRE
WILLIG, WILLIAMS & DAVIDSON
1845 Walnut Street, 24th Floor
Philadelphia, PA 19103
Telephone: (215) 656-3600
Facsimile: (215) 546-0942
E-mail: lhoye@wwdlaw.com

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